

Employee Post-Travel Disclosure of Travel Expenses

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Post-Travel Filing Instructions: Complete this form within 30 days of returning from travel. Submit all forms to the Office of Public Records in 232 Hart Building.

In compliance with Rule 35.2(a) and (c), I make the following disclosures with respect to travel expenses that have been or will be reimbursed/paid for me. I also certify that I have attached:

- ☒ The **original** Employee Pre-Travel Authorization (Form RE-1), **AND**
- ☒ A **copy** of the Private Sponsor Travel Certification Form with all attachments (itinerary, invitee list, etc.)

The Aspen Institute, Inc. (Congressional Program)

Private Sponsor(s) (list all):

Travel date(s): October 9- October 13, 2017

Name of accompanying family member (if any):

Relationship to Traveler: ☐ Spouse ☐ Child

IF THE COST OF LODGING DID NOT INCREASE DUE TO THE ACCOMPANYING SPOUSE OR DEPENDENT CHILD, ONLY INCLUDE LODGING COSTS IN EMPLOYEE EXPENSES. (Attach additional pages if necessary.)

Expenses for Employee:

	Transportation Expenses	Lodging Expenses	Meal Expenses	Other Expenses (Amount & Description)
<input checked="" type="checkbox"/> Good Faith Estimate <input type="checkbox"/> Actual Amount	\$1,550	\$537	\$210	\$137 meeting room expenses

Expenses for Accompanying Spouse or Dependent Child (if applicable):

	Transportation Expenses	Lodging Expenses	Meal Expenses	Other Expenses (Amount & Description)
<input type="checkbox"/> Good Faith Estimate <input type="checkbox"/> Actual Amount				

Provide a description of all meetings and events attended. See Senate Rule 35.2(c)(6). (Attach additional pages if necessary.):

See attached agenda

09 NOV 17
(Date)

Benjamin Smith Puerre
(Printed name of traveler)

(Signature of traveler)

TO BE COMPLETED BY SUPERVISING MEMBER/OFFICER:

I have made a determination that the expenses set out above in connections with travel described in the Employee Pre-Travel Authorization form, are necessary transportation, lodging, and related expenses as defined in Rule 35.

09 NOV 2017
(Date)

(Signature of Supervising Senator/Officer)

PRIVATE SPONSOR TRAVEL CERTIFICATION FORM

This form must be completed by any private entity offering to provide travel or reimbursement for travel to Senate Members, officers, or employees (Senate Rule 35, clause 2). Each sponsor of a fact-finding trip must sign the completed form. The trip sponsor(s) must provide a copy of the completed form to each invited Senate traveler, who will then forward it to the Ethics Committee with any other required materials. The trip sponsor(s) should **NOT** submit the form directly to the Ethics Committee. Please consult the accompanying instructions for more detailed definitions and other key information.

The Senate Member, officer, or employee **MUST** also provide a copy of this form, along with the appropriate travel authorization and reimbursement form, to the Office of Public Records (OPR), Room 232 of the Hart Building, within thirty (30) days after the travel is completed.

1. Sponsor(s) of the trip (please list all sponsors):
The Aspen Institute, Inc. (Congressional Program)
2. Description of the trip: An extensive analysis of European security concerns and Russian assertiveness and the impact on U.S. foreign policy.
3. Dates of travel: Oct. 9, 2017-Oct. 13, 2017
4. Place of travel: Warsaw, Poland
5. Name and title of Senate invitees: See attached list
6. I certify that the trip fits one of the following categories:
☒ (A) The sponsor(s) are not registered lobbyists or agents of a foreign principal and do not retain or employ registered lobbyists or agents of a foreign principal and no lobbyist or agents of a foreign principal will accompany the Member, officer, or employee *at any point* throughout the trip.
~~OR~~
☐ (B) The sponsor or sponsors are not registered lobbyists or agents of a foreign principal, but retain or employ one or more registered lobbyists or agents of a foreign principal and the trip meets the requirements of Senate Rule 35.2(a)(2)(A)(i) or (ii) (*see question 9*).
7. ☒ I certify that the trip will not be financed in any part by a registered lobbyist or agent of a foreign principal.
~~AND~~
☒ I certify that the sponsor or sponsors will not accept funds or in-kind contributions earmarked directly or indirectly for the purpose of financing this specific trip from a registered lobbyist or agent of a foreign principal or from a private entity that retains or employs one or more registered lobbyists or agents of a foreign principal.
8. I certify that:
☒ The trip will not in any part be planned, organized, requested, or arranged by a registered lobbyist or agent of a foreign principal except for *de minimis* lobbyist involvement.
~~AND~~
☒ The traveler will not be accompanied on the trip by a registered lobbyist or agent of a foreign principal except as provided for by Committee regulations relating to lobbyist accompaniment (*see question 9*).

9. **USE ONLY IF YOU CHECKED QUESTION 6(B)**

I *certify* that if the sponsor or sponsors retain or employ one or more registered lobbyists or agents of a foreign principal, one of the following scenarios applies:

- ☐ (A) The trip is for attendance or participation in a one-day event (exclusive of travel time and one overnight stay) and no registered lobbyists or agents of a foreign principal will accompany the Member, officer, or employee *on any segment* of the trip.
- ☐ (B) The trip is for attendance or participation in a one-day event (exclusive of travel time and two overnight stays) and no registered lobbyists or agents of a foreign principal will accompany the Member, officer, or employee *on any segment* of the trip (see questions 6 and 10).
- ☐ (C) The trip is being sponsored only by an organization or organizations designated under § 501(c)(3) of the Internal Revenue Code of 1986 and no registered lobbyists or agents of a foreign principal will accompany the Member, officer, or employee *at any point* throughout the trip.

10. **USE ONLY IF YOU CHECKED QUESTION 9(B)**

If the trip includes two overnight stays, please explain why the second night is practically required for Senate invitees to participate in the travel:

11. ☒ An itinerary for the trip is attached to this form. I *certify* that the attached itinerary is a detailed (hour-by-hour), complete, and final itinerary for the trip.

12. Briefly describe the role of each sponsor in organizing and conducting the trip:

The Aspen Institute Congressional Program (AICP) is the sole sponsor of this conference and developed the agenda, organized the travel, planned the conference, and invited the participants

13. Briefly describe the stated mission of each sponsor and how the purpose of the trip relates to that mission:

Aspen Institute's Congressional Program (AICP) is a non-profit organization, and its broad mission is conducting nonpartisan forums and the exchange of ideas on issues impacting the United States and the world. The Aspen Institute Congressional Program's conference in Warsaw, Poland is for congressional staff members to take an in-depth look at European security, Russian assertiveness and the impact on US foreign policy.

14. Briefly describe each sponsor's prior history of sponsoring congressional trips:

The Aspen Institute Congressional Program has a 34-year history of conducting non-partisan education forums for members of Congress.

15. Briefly describe the educational activities performed by each sponsor (other than sponsoring congressional trips):

In addition to the conferences, AICP annually offers 25 breakfasts for members of Congress, 5 lunches for congressional staff members-each event offering a leading scholar on a key national or international issue. One congressional staff conference per year is offered on a key foreign or domestic issue.

16. Total Expenses for Each Participant:

	Transportation Expenses	Lodging Expenses	Meal Expenses	Other Expenses
<input checked="" type="checkbox"/> Good Faith estimate	\$2,000	\$537	\$210	\$137 meeting room expenses
<input type="checkbox"/> Actual Amounts				

17. State whether a) the trip involves an event that is arranged or organized *without regard* to congressional participation or b) the trip involves an event that is arranged or organized *specifically with regard* to congressional participation:

The conference is organized specifically with regard to congressional participation.

18. Reason for selecting the location of the event or trip

Warsaw, Poland provides a central meeting point for international scholars including Russians & experts from the region to provide analysis of European security issues, Russia's role, & impact on US policy.

19. Name and location of hotel or other lodging facility:

Hotel Bristol, Warsaw, Poland

20. Reason(s) for selecting hotel or other lodging facility:

The hotel offers conference services required including technology and meeting space. Facility security was a key factor including private meeting space and dining rooms.

21. Describe how the daily expenses for lodging, meals, and other expenses provided to trip participants compares to the maximum per diem rates for official Federal Government travel:

Lodging and meals are both under the published per diem for the time period.

22. Describe the type and class of transportation being provided. Indicate whether coach, business-class or first class transportation will be provided. If first-class fare is being provided, please explain why first-class travel is necessary:

Coach class flights on commercial airline carrier

23. ☒ I represent that the travel expenses that will be paid for or reimbursed to Senate invitees do not include expenditures for recreational activities, alcohol, or entertainment (other than entertainment provided to all attendees as an integral part of the event, as permissible under Senate Rule 35).

24. List any entertainment that will be provided to, paid for, or reimbursed to Senate invitees and explain why the entertainment is an integral part of the event:

None

25. I hereby *certify* that the information contained herein is true, complete and correct. (You must include the completed signature block below for each travel sponsor.):

Signature of Travel Sponsor:

Name and Title: Dan Glickman, Vice President, Aspen Institute; Executive Director, Congressional Program

Name of Organization: The Aspen Institute, Inc. (Congressional Program)

Address: 1 Dupont Circle, NW, Washington, DC 20036

Telephone Number: 202-736-5859 (Lisa Jones)

Fax Number: NA

E-mail Address: lisa.jones@aspeninst.org

Question 1. Sponsor(s) of the trip (please list all sponsors) – The Aspen Institute, Inc. (Congressional Program)

Aspen Institute is the sole sponsor of this European Security and Assertiveness of Russia conference. The organization has received general support and unrestricted funds from The Henry Luce Foundation, Democracy Fund foundation, Rockefeller Brothers Fund foundation, the John D. and Catherine T. MacArthur Foundation. These foundation funds were not earmarked for a specific trip.

Question 14. On occasion, other policy and public programs of the Aspen Institute sponsor trips that involve members of Congress or congressional staff.

Question 15. The Aspen Institute holds numerous educational activities, including conferences, roundtables, briefings and other nonpartisan forums on critical issues facing the U.S. and the world.

Question 16.

Daily breakdown of meeting room expenses for the per person total of \$137:

Oct. 10 - \$45.67

Oct. 11 - \$45.67

Oct. 12 - \$45.67

0000000000

EUROPEAN SECURITY & RUSSIAN ASSERTIVENESS: CHALLENGES FOR U.S. POLICY

THE ASPEN INSTITUTE CONGRESSIONAL PROGRAM
CONGRESSIONAL STAFF CONFERENCE
October 9-13, Warsaw, Poland

MONDAY, October 9:

Congressional staff participants depart Washington, DC at 6:10 pm on Air France 55.

TUESDAY, October 10:

Congressional staff participants arrive in Warsaw at 11:55 am on Air France #1146.

1:30-2:30 pm

Luncheon remarks

INTRODUCTION AND FRAMEWORK OF THE CONFERENCE

Dan Glickman, Executive Director, Aspen Institute Congressional Program

Dan Glickman will introduce the scholars for the "European Security & Russian Assertiveness: Challenges for U.S. Policy" conference and briefly outline their expertise. The conference was designed to incorporate scholarship from the entire region, including Poland, Germany, Russia, Latvia, Italy and Hungary. Glickman will highlight how the conference will be conducted, how those with questions will be recognized and how responses will be timed to allow for as many questions and answers as possible. This format is especially important to guarantee full participation with so many knowledgeable and experienced people around the table, not only the speakers on each panel.

3:00-5:00 pm

Walking Educational Site Visit

WARSAW'S HISTORICAL CONTEXT:

WWII'S IMPACT AND RELEVANCE FOR U.S. POLICY

Slawomir Debski, Director of the Polish Institute of International Affairs in Warsaw, will lead an educational visit to Warsaw's historic 13th Century Old Town, with an accompanying briefing on historical issues. This presentation will describe the security environment that contributes significantly to the political framework in Poland. During the Invasion of Poland (1939), much of the district was badly damaged by the German Luftwaffe, which targeted the city's residential areas and historic landmarks in a campaign of terror bombing. Following the Siege of Warsaw, parts of the Old Town were rebuilt, but immediately after the Warsaw Uprising (August–October 1944) what had been left standing was systematically blown up by the German Army. After World War II, the Old Town was meticulously rebuilt. Warsaw hosted the 2016 NATO summit, which was the main forum for NATO governments to determine their ongoing response to Russian aggression in Ukraine, and potential challenges from Russia in the wider Baltic region. This physical place

two countries set on an inevitable “collision course” in their respective foreign policies, dictated by divergent national interests and worldviews, or is the current impasse more a function of specific policy disagreements or tensions between stakeholders?

- What are Russia's national interests? What are Russia's aspirations for its role in the world?
- How do Russia's perceptions of its national interests affect Russia's policy toward the U.S., the European Union, former Soviet states? Does Russia view the U.S. and its European neighbors as threats?
- What are the risks of continued or deepening U.S.-Russia conflict?
- How does each side perceive the role of "hacking" and "cyber attacks" during the 2016 U.S. election and how does this impact core foreign policy concerns?
- What kind of U.S. policies are likely to lead to an outcome where Russia is less of a threat and/or adversary?

David Herszenhorn, former New York Times Moscow correspondent,
European correspondent for POLITICO, Brussels

**Andrei Sushentsov, Program Director,
Valdai Discussion Club Foundation, Moscow**

10:30 am

THE RUSSIAN ECONOMY AND DOMESTIC POLITICS

Under Western sanctions and formal diplomatic isolation since the outbreak of the Ukraine crisis in 2014, Russia has suffered economic decline exacerbated by low global energy and commodity prices and its own lack of structural reform. On several occasions this year alone, thousands of young Russians have turned out in protest against official corruption, in cities across the country. Yet the Russian economy appears set to recover ground in 2017, and Russia's government has not suffered the negative political consequences that many Western experts predicted. For President Vladimir Putin, who remains consistently popular, the signs all point to yet another successful "managed election" in March 2018, allowing him to legally stay in power through 2024.

- What is the national mood in Russia today, and what are people's main concerns?
- What is the state of the Russian media, civil society, and independent political activity?
- What is the role of nationalism and the politics of historical memory/mythology in Russian politics?
- Is Russia effectively isolated as a result of Western sanctions? How has it pursued non-Western economic relationships and developed new trading blocs as an alternative?

- Is Russia a state in decline or a rising global power? What are Russia's aspirations regarding its role in the world?
- What is the explanation for Vladimir Putin's continuing high popularity? Is it appropriate to think in terms of the longevity of the "Putin system"?

Kirill Rogov, Senior Researcher, Liberal Mission Foundation, Moscow
Gwendolyn Sasse, Director, Center for East European
 and International Studies, Berlin

Noon-2:00 pm

Luncheon Remarks

CAN RUSSIA EVER BE A DEMOCRACY?

Ivan Krastev, Chair, Center for Liberal Studies, Sofia

Ivan Krastev has written extensively on Russian domestic politics as well as Russian-European-U.S. relations. He will address the central question of whether a positive change in Russia's domestic politics is possible or likely, and what if any role the U.S.-Russia relationship plays in that. He will also offer his own perspective on Russian decision-making, and assess whether and how the kinds of incentives and punishments imposed by Western governments are likely to influence Russian policy.

2:00-5:00 pm

EDUCATIONAL SITE VISIT TO THE POLIN MUSEUM

Dariusz Stola, Director of the Museum of the History of Polish Jews (POLIN), which just opened two years ago, will lead us on an educational visit to this narrative museum with an accompanying presentation on the 1,000-year history of Polish Jews. The museum is the first public-private partnership in Poland, created jointly by the government, the local government, and a non-governmental organization, and its mission is to recall and preserve the memory of the history of Polish Jews and to contribute to the mutual understanding and respect amongst Poles and Jews as well as other societies of Europe and the world. Before the outbreak of World War II, more than 3.3 million Jews lived in Poland, the largest Jewish population of Europe and second largest Jewish community in the world. After the German invasion of Poland in September 1939, ghettos were established in Warsaw, Lodz, Lublin, Radom and Lvov. By 1942, all Polish Jews were either confined to ghettos or hiding; more than half a million lived in Warsaw's ghetto. Barely 11 percent of Poland's Jews - 369,000 - survived the war. The POLIN Museum is part of a Jewish revival that has occurred since the fall of communism in Poland. The POLIN museum is the single most important museum related to the experience of Jews in Europe over the last century. This briefing will help Senate staff understand how the Jewish experience has shaped public perceptions in Europe, especially among Americans with family ties to the region. That continues to be true, especially today, when the experience of religious minorities (Jews, Muslims, Roma, and others) is a major factor in U.S. policies towards Russia, Poland, and other regional states.

7:00-9:00 pm

Working Dinner

Scholars and Congressional staff will explore topics covered in the conference. Seating is arranged to expose participants to a diverse range of views and provide opportunity for a meaningful exchange of ideas. Scholars and congressional staff are rotated daily. Scholars will discuss their perspective on European security and Russian assertiveness and the challenges for U.S. policy.

THURSDAY, October 12:

7:30-9:00 am

Breakfast for all participants

9:00 am

Roundtable Discussions

UKRAINE, RUSSIA AND THE WEST

The crisis in Ukraine is now the most acute consequence of the failure over a quarter century to establish an inclusive Euro-Atlantic and Eurasian security architecture within which both Russian and Western security interests can be accommodated. The ongoing conflict in Ukraine's Eastern region costs more lives than any other in the post-Soviet region, and appears to be an effective Russian "veto" over Ukraine's closer cooperation with the West, including with NATO. Moreover, the ongoing conflict complicates debates around domestic problems in Ukraine, where oligarchs still exercise a degree of control over politics, media and the economy reminiscent of the pre-Maidan era, "fake news" is ubiquitous, and nationalist forces peddle simplistic but divisive populism. The forcible annexation of Crimea by Russia remains a sore spot in this complex relationship.

- What is the state of the conflict in Ukraine now?
- What is Russia's motivation for intervening in Ukraine? How does it see U.S. and European involvement there?
- Can the Minsk agreements be salvaged as a framework for managing and resolving the Donbas conflict?
- What is the likelihood of further major Russian interference in the former Soviet space? How vulnerable are other states in the post-Soviet region, such as Moldova, Georgia, or Belarus?
- What are the prospects for the dispute over Crimea? Will this be an indefinite obstacle to productive relations between Ukraine and Russia, and between Russia and the West?
- What U.S. and European policies are likely to help lessen the Russian threat to its neighbors?

Wojciech Kononczuk, Senior Scholar, Center for Eastern Studies,
Warsaw

Oleksii Semenii, Director, Institute for Global Transformations, Kyiv

07-69-0000

Russians assert that two decades of NATO enlargement have demonstrated Washington's indifference to Russian security concerns. Meanwhile, U.S. allies in NATO identify Russia as an acute threat to their security, and point to Russia's "hybrid" and conventional attacks on Ukraine, Georgia, Estonia and other states as proof of Moscow's aggressive intentions. With both Moscow and Washington accusing the other side of violating foundational nuclear arms control treaties, frequent "near miss" incidents in the air and at sea, and increasing concentrations of conventional military forces operating in close proximity to one another in the Baltic, Black Sea and Eastern Mediterranean regions, the risks of escalation are serious with potentially disastrous consequences.

- Andis Kudors**, Director, Center for East-European Policy Studies, Riga
Jeffrey Larsen, Director, Research Division, NATO Defense College,
 Rome

Luncheon Remarks

Michal Baranowski and Slawomir Debski are two of the best known and leading Polish experts on transatlantic relations and European security. They will describe the role of U.S.-NATO and U.S.-Poland relations in shaping the West's collective response to the security challenges posed by Russia. They will also offer a Polish perspective on the conflict between two of its neighbors—Russia and Ukraine.

Michał Baranowski, Director, Warsaw office, German Marshall Fund,
Warsaw

Sławomir Debski, Director, Polish Institute of International Affairs,
Warsaw

Wojciech Kononczuk, Senior Scholar at the Center for Eastern Studies in Warsaw will lead a visit to the Warsaw Rising Museum, with an accompanying briefing on the impact of the Warsaw Uprising. The Museum is a tribute of Warsaw's residents to those who fought and died for an independent Poland during WWII. The museum shows the struggle of everyday life before and during the Warsaw Uprising and the horror of occupation to the post-war communist era. The Warsaw uprising, which ended in bloody repression by the occupying German army, was a defining event of the twentieth century not just for citizens of Warsaw, but for all Poles. The museum not only presents these historical events, but the role of the events in the collective national identity of Poles for the half century that followed, including under Soviet occupation from 1944 to 1989. Understanding these issues, and the influence they have on Poland's views of both Germany and Russia, is vital for Americans to effectively manage relations with Poland today.

Working Dinner
Scholars and Congressional staff will explore topics covered in the conference. Seating is arranged to expose participants to a diverse range of views and provide opportunity for a meaningful exchange of ideas. Scholars and congressional staff are rotated daily. Scholars will discuss their perspective on European security and Russian assertiveness and the challenges for U.S. policy.

Congressional staff participants depart Warsaw at 6 am on KLM 1362 and arrive in Washington, DC at 3:35 pm on KLM 651.



June 15, 2017

Dan Glickman

Executive Director

Congressional Program

Ben Purser
Senate Foreign Relations, Professional Staff Member
US Senate
Washington, DC 20510

Dear Ben:

I would like to invite you to participate in a conference designed exclusively for the educational benefit of a bipartisan, bicameral group of senior congressional staff focusing on *European Security and Russian Assertiveness: Challenges for U.S. Policy* in Warsaw, Poland October 9-13, 2017 (including travel to and from Washington).

We have assembled a group of outstanding scholars from Warsaw, Berlin, Moscow, Kyiv, Riga, Brussels and Sofia to enhance the discussions. Matt Rojansky, Director of the Kennan Institute at the Wilson Center, will participate as well.

Attendance is by invitation only, with no outside observers, press, or lobbyists. Funding for this project is provided by grants from the Henry Luce Foundation, the Democracy Fund, the MacArthur Foundation and Rockefeller Brothers Fund —no government, individual, foreign, corporate or special interest funds are accepted. We will provide you with a signed Private Sponsor Travel Certification Form affirming that no lobbyists fund this activity, that the Aspen Institute does not hire or retain lobbyists, and that no lobbyists will be present. Our purpose is education, not advocacy.

Departure will be on Monday, October 9th and we will return to the U.S. on Friday, October 13th. Should you accept the invitation, it is required that you participate throughout the duration of the conference. Your expenses, including airfare, lodging and meals, will be paid by the Aspen Institute Congressional Program. Under the ethics rules, no expenses are covered for entertainment or recreation.

Additionally, we have luncheon meetings throughout the year for congressional staff with speakers on public policy challenges. We hope you will be able to participate in the extended educational offerings of this series. If you have any questions, please feel free to call Melissa Neal at 202-736-3858. I hope you will be able to join us for this important conference.

Sincerely,

Dan Glickman

One Dupont Circle, NW

Suite 700

Washington, DC 20036-1133

PH 202.736.5825

FX 202.785-2737

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United States Senate

SELECT COMMITTEE ON ETHICS

October 3, 2017

Benjamin Swift Purser, III.
Committee on Foreign Relations
United States Senate
Washington, DC 20510

Dear Mr. Purser:

This responds to your recent correspondence concerning an invitation you received to travel to the *European Security and Russian Assertiveness: Challenges for U.S. Policy* conference, in Warsaw, Poland, on October 9-13, 2017, sponsored by the Aspen Institute (Aspen). Aspen certified to the Select Committee on Ethics (the Committee) that it will pay the *necessary expenses*¹ related to the travel and that it is neither a lobbyist, nor lobbying firm, nor agent of a foreign principal, and it is not otherwise acting as a representative or agent of a foreign government. Aspen has also certified that it does not retain or employ a registered lobbyist or agent of a foreign principal and that no registered lobbyist will accompany you at *any point throughout your trip*.²

Based on information and materials available to the Committee, and assuming the actual travel and travel-related expenses conform to the information and materials you provided, it appears that the proposed payment or reimbursement of necessary expenses for this trip **may be accepted** under relevant Senate Rules and the Committee's *Regulations and Guidelines for Privately-Sponsored Travel*, so long as at the time of the payment or reimbursement, Aspen is neither a registered lobbyist nor lobbying firm under the Lobbying Disclosure Act of 1995, nor an agent of a foreign principal under the Foreign Agents Registration Act (and is not otherwise acting as a representative or agent of a foreign government), and provided the travel and all required documents are disclosed to the Secretary of the Senate in accordance with the provisions of Senate Rules 34 and 35.

Under Senate Rule 35, Senate staff must receive advance authorization signed by the Member or officer under whose direct supervision the individual works in order to accept payment or reimbursement for necessary expenses related to fact-finding travel. Further, such authorization and expenses must be disclosed to the Secretary of the Senate by filing the completed *Employee Pre-Travel Authorization* and the *Employee Post-Travel Disclosure of Travel Expenses* (Form RE-1 and Form RE-2), along with a copy of the *Private Sponsor Travel*

¹ The term “necessary expenses” has a specific definition. See *Select Committee on Ethics’ Regulations and Guidelines for Privately-Sponsored Travel – Glossary of Terms* at 8.

² The term “any point throughout your trip” has a specific definition. See *Select Committee on Ethics’ Regulations and Guidelines for Privately-Sponsored Travel – Glossary of Terms* at 2.

Certification Form, and all relevant attachments (e.g., the private sponsor's invitation and itinerary) **within 30 days of the conclusion of Privately-Sponsored Travel.**

The Committee has determined that § 501(c)(3) non-profit organizations that are classified as private foundations, as opposed to public charities, may not pay for transportation from the United States to a foreign country.³ However, Aspen represented to the Committee that it is a § 501(c)(3) public charity, as opposed to a private foundation, pursuant to the Internal Revenue Code.⁴

Please be advised that the United States Constitution prohibits the acceptance of any gift, including a meal, from a foreign government without the consent of Congress. In the Foreign Gifts and Decorations Act (FGDA), Congress consented to the acceptance by federal government officials of: (1) gifts of minimal value and (2) travel or the expenses for travel taking place entirely outside the United States, from a foreign government (which includes those acting as a representative or agent of a foreign government).⁵ The Senate has defined minimal value as \$100 or less. Further, pursuant to FGDA, there are certain reporting and procedural requirements that are imposed upon Members, officers, and employees who accept gifts from a foreign government. Please review the Committee's "Dear Colleague" letter of January 9, 2015 setting forth the items to be included in filing that report.

Finally, Senate Rule 34 requires a reporting individual,⁶ on his or her Financial Disclosure Report, to make an annual disclosure of the receipt of payments or reimbursements under Senate Rule 35 from a private sponsor for officially-related travel expenses where, in the aggregate, travel expenses exceed \$390 from that sponsor during a calendar year. However, if a Member, officer, or employee properly reports the receipt of necessary expenses for such travel to the Secretary of the Senate within 30 days of the travel, as discussed above, the travel expenses need not be disclosed a second time on their Financial Disclosure Report.

If you have any additional questions, please do not hesitate to contact the Committee.

Sincerely,



Deborah Sue Mayer
Chief Counsel and Staff Director

Enclosure: Travel Checklist

³ See 26 U.S.C. § 4941 et seq. Section 501(c)(3) of the Internal Revenue Code broadly defines non-profit, charitable, tax-exempt organizations. These § 501(c)(3) organizations are then further defined or designated as "public charities" and "private foundations."

⁴ 26 U.S.C. § 501(c)(3).

⁵ 5 U.S.C. § 7342.

⁶ A reporting individual is someone whose salary equals or exceeds 120% of the basic rate of pay for GS-15 (\$124,406 for CY 2017) or is a political fund designee and is required to file Financial Disclosure Reports.